



**HERRICK**

**Victor J. Rocco**

**Partner**

Phone: 212.592.1422

Fax: 212.545.2333

vrocco@herrick.com

March 30, 2018

**BY ECF**

Honorable Richard M. Berman  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Courtroom 17B  
New York, NY 10007-1312

**Re: United States v. Mehmet Hakan Atilla, S4 15 Cr. 867 (RMB)**

Dear Judge Berman:

Further to our letter to the Court of March 26<sup>th</sup>, we write out of an abundance of caution briefly to clarify our response to the Court's Order dated January 18, 2018 ("the Order"). We understand the Order not to include our communications with members of the United States Attorney's Office for the Southern District of New York incident to the prosecution of the captioned matter. Accordingly, we have omitted those communications from our March 26<sup>th</sup> letter to the Court. Aside from these routine contacts with the prosecution team, our only communications with representatives of the U.S. government were with regard to requesting the testimony of current and former employees of the federal government and obtaining documents for use at trial.

Respectfully submitted,

HERRICK, FEINSTEIN LLP

FLEMING RUVOLDT PLLC

By: /s/Victor J. Rocco

By: /s/Cathy Fleming

Victor J. Rocco  
Two Park Avenue  
New York, New York 10016  
(212) 592-1400

Cathy Fleming  
1700 Broadway, 28<sup>th</sup> Floor  
New York, New York 10019  
(212) 706-1850



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McDERMOTT WILL & EMERY LLP

LAW OFFICES OF JOSHUA L. DRATEL

By: /s/ Todd Harrison

By: /s/ Joshua L. Dratel

Todd Harrison  
340 Madison Avenue  
New York, New York 10173  
(212) 547-5727

Joshua Dratel  
29 Broadway, Suite 1412  
New York, New York 10006  
(212) 571-3792

*Attorneys for Defendant Mehmet Hakan Atilla*

cc: Assistant U.S. Attorneys Michael Lockard, David Denton, Sidhardha Kamaraju and Dean Sovolos